ORIGIT Case 1:11-cv-06993-LLS Document 23 Filed 01/11/12 Page 1 of 2

UNITED STATES DISTRICT COURT SOTHERN DISTRICT OF NEW YORK

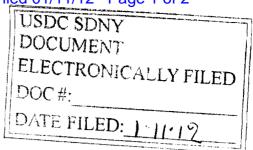
CITIGROUP GLOBAL MARKETS INC.,

Plaintiff,

٧.

ABDULLAH MAHMOUD ABBAR, GHAZI ABDULLAH ABBAR, AJIAL LEVERAGED FEEDER HOLDINGS LIMITED, AMATRA LEVERAGED FEEDER HOLDINGS, LIMITED, AMAVEST HOLDINGS LIMITED, and GAMA INVESTMENT HOLDINGS LIMITED, LIMITED, AMAVEST HOLDINGS LIMITED, AMAYEST HOLDINGS LIMITE

Defendants.



Case No. 11 Civ. 6993(LLS)

STIPULATION AND [PROPOSED] SCHEDULING ORDER

ECF CASE

STIPULATION AND (PROPOSED) SCHEDULING ORDER

It is hereby ORDERED that:

- 1. The information each party is required to disclose pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure shall be included among the documents each party will produce pursuant to the requests for production already exchanged by the parties, unless otherwise agreed by the parties.
- 2. Document production shall begin on a rolling basis on January 5, 2012, and shall be substantially completed by January 20, 2012.
 - 3. All fact depositions shall be completed by April 6, 2012.
- 4. Notwithstanding the April 6, 2012 deadline for fact witness depositions, any party witnesses identified as a trial witnesses after such date but not deposed during fact discovery will be produced for deposition within a reasonable period of time prior to trial.
- 5. Fact discovery, including discovery from third-parties, shall be completed by April 6, 2012.

レレら

- 6. At the Court's discretion, any disputes concerning discovery that might be subject to a motion under Rules 26 through 37, inclusive, of the Federal Rules of Civil Procedure may be resolved at a conference after submission of three-page letter briefs by the parties, in lieu of a formal motion made pursuant to the Federal Rules of Civil Procedure and the Local Civil Rules.
- 7. A status conference after the close of fact discovery will take place on April 13, 2012. Such status conference shall serve as a pre-motion conference for any dispositive motions the parties intend to file. At that status conference, the parties will discuss, if necessary, a schedule for pretrial proceedings.
- 8. The terms of this Stipulation and Order may be amended or modified by the Court, on motion or *sua sponte*, or by the written agreement of the Parties ordered by the Court.

Dated: New York, New York January ___, 2012

CONSENTED TO:

MILBANK TWEED HADDEY & McCLOY LLP

By:

Scott A. Edelman (8E 5247) (sedelman@millsank.com)
Daniel M. Perry (DP 6966) (dperry@milbank.com)
Jed M. Schwartz (JS 6184) (jschwartz@milbank.com)

1 Chase Manhattan Plaza New York, New York 10005-1413 Phone: (212) 530-5000

Fax: (212) 530-5219

Attorneys for Plaintiff Citigroup Global Markets Inc.

RICH, INTELISANO & KATZ, LLP

By:

John S. Rich (JR 1137) john@riklawfirm.com

111 Broadway, Suite 1303 New York, New York 10006 Phone: (212) 433-1480 Fax: (212) 433-1481

Attorneys for Defendants

SO ORDERED.

U.S.D.J.